

**GISKAN SOLOTAROFF & ANDERSON LLP**  
Attorneys at Law

December 12, 2024

**BY ECF**

Honorable Miroslav Lovric  
United States Magistrate Judge  
United States District Court  
Northern District of New York  
Binghamton U.S. Courthouse  
15 Henry St.  
Binghamton, NY 13901

**Re:    *Barzman v. SUNY Binghamton, et al.,*  
      Case No. 3:22-CV-367 (TJM/ML)**

Hon. Judge Lovric:

This firm represents Plaintiff Karen Barzman, Ph.D., in the above-referenced case. I submit this letter to respectfully request a one-week extension of time to submit Plaintiff's opposition papers to Defendants' motion for summary judgment, which is currently due tomorrow, December 13. If this request is granted, Plaintiff's opposition would be due December 20. Defendants' counsel consents to this request and asks that Defendants be given a brief extension of time to file their reply papers as well, from December 30, 2024, until January 3, 2025. Plaintiff consents to Defendants' request as well.

The reason for the requested extension is that I am lead counsel for Plaintiff on this matter and my two-year old daughter has been sick for the past few weeks, which has inhibited my ability to complete the opposition papers. Counsel have been meeting and conferring on a regular basis to ensure the schedule is fair for all parties.

Thank you for your time and consideration of this matter.

Respectfully submitted,

/s/ Amy E. Robinson

Amy E. Robinson

*Counsel for Plaintiff*